

May 5, 2008

Mr. Christopher A. Whyrick
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Mr. Whyrick:

The Rudy Giuliani Presidential Committee, Inc. (hereinafter "Committee"), FEC ID# C00430512, is in receipt of your Request for Additional Information (RFI) dated April 4, 2008 referencing the March Monthly FEC Report (2/1/08 - 2/29/08). The Committee's response follows.

General Election Contribution Refunds

The Committee established and maintained an accounting method pursuant to 11 CFR 102.9(e) to account for any general election contributions. As of the date of this response, all general election contributions have been refunded to the donors in accord with 11 CFR 102.9(e)(3) and the Committee has reported these transactions on its March and April 2008 Monthly FEC reports.

Primary Contributions and Net Outstanding Primary Campaign Debt

As of the date of the candidate's withdrawal from the presidential primary contest, the Committee had net debts outstanding and is permitted to continue to raise funds to retire this debt by accepting contributions pursuant to 11 CFR 110.1(b)(3) after the 1/30/08 withdrawal date.

Schedule B-P

With regard to the transactions referenced, the Committee has determined the following:

1. D.P. Crewboats, LLC - this contribution was reported on Schedule A, Line 17 on the July 2007 Quarterly Report. No amendment is necessary.
2. Karen Ann Levy - this contribution was reported on Schedule A, Line 17 on the July 2007 Quarterly Report. Prior to the 2/28/08 refund, the donor's record was updated to reflect her requested name change. The Committee will amend the July 2007 Quarterly Report to reflect this information.
3. Kenneth G. Langone & Elaine A. Langone - the contributions were properly reported on April 2007 Quarterly Report as pending redesignation to the general election and were subsequently redesignated to the general election. In addition, all required documentation was processed within the time limits allowed by the regulations. However, due to a technical issue, the contributors' records did not indicate the correct election reference. The Committee will amend the April 2007 Quarterly Report to reflect the correct information.
4. Harold B. Matzner - the contribution was properly reported on July 2007 Quarterly Report as pending redesignation to the general election and were subsequently redesignated to the general election. In addition, all required documentation was processed within the time limits allowed by the regulations. However, due to a technical issue, the contributor's record did not indicate the correct election reference. The Committee will amend the July 2007 Quarterly Report to reflect the correct information.
5. John Rallis - the contribution was properly reported on April 2007 Quarterly Report as pending redesignation to the general election and were subsequently redesignated to the general election. In addition, all required documentation

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was processed within the time limits allowed by the regulations. However, due to a technical issue, the contributor's record did not indicate the correct election reference. The Committee will amend the July 2007 Quarterly Report to reflect the correct information.

Sincerely,

John H. Gross
Treasurer
